ELECTRONIC CHROME & GRINDING CO. INC.

9128-32 DICE RD. • SANTA FE SPRINGS, CA 90670 • (562) 946-6671 • FAX (562) 946-5903

Hard Chrome Plating • Internal & External Grinding
Chrome Tanks 16 Foot Depth • Power Honing to 6" Capacity
Grinding Capacity to 20" x 120" • Centerless Grinding

07/16/07

Mr. Alan Ingham
Office of Pollution Prevention and Technology Development
Department of Topic Substances Control
800 Cal Center Drive
Sacramento, CA 95826-3200

Re: SB-14 Summary Progress Report

Dear Mr. Ingham:

Enclosed is our SB-14 Summary Progress Report dated 7/12/07. We have supporting documentation on file at our office.

Very Truly Yours,

Mike Reed

Mike Reed
VP/GM

/jg

State of California – California Environmental Protection Agency

Department of Toxic Substances Control

SB 14 SUMMARY PROGRESS REPORT

TABLE 1: GENERAL INFORMATION

Date 07/12/07

A hazardous waste generator subject to SB 14, is required to complete and submit Tables 1 and 2 to the Department of Toxic Substances Control by September 1, 2007. The generator is to submit only one Table 1. However, the generator may need to submit more than one Table 2, (one for each reportable waste stream).

See Summary Progress Report publication or SB 14 Guidance Manual Chapter 7, for assistance.

(1) NAME OF GENERATOR, FACILITY, or BUSINESS	☐ (1a) MULTI-SITE? (If this is a multi-site business, please check this box and list the primary EPA ID number under box #2 and add the remaining EPA ID numbers under "COMMENTS" below. Combine data for similar wastes from the multiple sites for the remainder of the Summary Progress Report).	
Electronic Chrome & Grinding, Inc.		
(2) EPA ID NO. CAD 008391427	(3) SIC CODE 3471	(4) NAICS CODE
(5) STREET ADDRESS 9128-32 Dice Rd.	(6) CITY Santa Fe Springs	(7) COUNTY Los Angeles
(8) MAILING ADDRESS 9128-32 Dice Rd.	(9) CITY Santa Fe Springs	(10) ZIP CODE 90670
(11) CONTACT NAME Mike Reed		(12) CONTACT PHONE 562-946-6671
(13) TYPE OF BUSINESS, OPERATION, or ACTIVITY Hard Chrome plating & grinding job shop.		

(14) SB 14 reportable total quantities of Hazardous Waste Generated at Site, for 2002 and 2006 Reporting Years.

Reportable Total Quantities include all hazardous wastes subject to SB 14.

Do not include nonroutinely generated, exempted, or secondary wastes. Exempted and nonroutinely generated wastes are listed in Section 67100.2(c), Title 22, California Code of Regulations. Secondary waste is a hazardous waste sludge or precipitate that is generated as a result of onsite treatment of liquid hazardous waste that is sent to a POTW or receiving water under NPDES permit.

Obtain information requested below from your 2002 and 2006 Plans or Compliance Checklists.	2002	2006
(15) SB 14 hazardous waste processed onsite in a wastewater treatment unit for discharge to POTW or NPDES permit (Category A*) Total:	0 lbs	0 lbs
(16) All other SB 14 hazardous waste (Category B*) Total:	29,000 lbs	51,200/37,200 lbs
(17) All extremely hazardous waste Total:	0 lbs	0 lbs

* Category A was previously referred to as aqueous waste. Category B was previously referred to as nonaqueous waste.

(18) COMMENTS regarding hazardous waste source reduction and recycling activities (add page if needed).

Year	Production AH/Yr	HW Generated	HW/AH
1998	39,267,677	82,000	0.0021 #/AH
2002	19,972,041	29,000	0.0015 #/AH
2006	48,602,127	51,000	0.0010 #/AH

Our HW generated per unit of production is decreasing
*Without the 14,000 # of non-routinely generated waste.

DTSC 1262 (11/14/06)

State of California – California Environmental Protection Agency

Department of Toxic Substances Control

TABLE 2: SPECIFIC WASTE STREAM INFORMATION

DATE 07/12/07

Complete and submit a separate Table 2 for each major hazardous waste stream and for each minor hazardous waste stream for which a source reduction measure was selected.

IDENTIFICATION

(19) NAME OF GENERATOR, FACILITY, or BUSINESS	(20) EPA ID NO.
Electronic Chrome & Grinding, Inc.	CAD 008391427
(21) HAZARDOUS WASTE STREAM DESCRIPTION	(22) CALIFORNIA WASTE CODE
Filter cake from HCI stripping solution with chrome	CWC 181 D007,F006

(23) THIS HAZARDOUS WASTE IS (please check one):

___ Processed onsite in a wastewater treatment unit for discharge to POTW or NPDES permit (Category A)

__X__ Other SB 14 hazardous waste (Category B)

___ Extremely hazardous waste

ACCOMPLISHMENTS

Your 2002 SB 14 Plan, Performance Report, or Compliance Checklist, has this information.

(24) Provide the following information for this waste stream:

How much waste was generated in the 2002 Reporting Year? 23,500 pounds

Describe the source reduction measure(s) implemented since 2002 (add page if needed): Better awareness of hazardous waste being generated

Estimate when this source reduction measure was implemented: _____ Month 2002 year

For this measure, what source reduction quantity was projected in the 2002 Plan: _____ pounds per year

Estimate the quantity of waste reduced annually by this measure since implementation: Production increased 140%; waste increased 28% pounds per year

(See Summary Progress Report publication or SB 14 Guidance Manual Chapter 6, to help estimate hazardous waste reduced.)

PROJECTIONS

Your 2006 SB 14 Plan or Compliance Checklist has this information.

(25) Provide the following information for this waste stream:

How much waste was generated in the 2006 Reporting Year? 30,000 pounds

Describe the source reduction measure selected to be implemented By 2010: (Add page if needed.) _____

Estimate when this source reduction measure will be implemented: _____ month _____ year

What is the annual projected source reduction quantity identified in the 2006 Plan? 5% 1500 pounds per year

State of California – California Environmental Protection Agency

Department of Toxic Substances Control

TABLE 2: SPECIFIC WASTE STREAM INFORMATION

DATE 07/12/07

Complete and submit a separate Table 2 for each major hazardous waste stream and for each minor hazardous waste stream for which a source reduction measure was selected.

IDENTIFICATION

(19) NAME OF GENERATOR, FACILITY, or BUSINESS	(20) EPA ID NO.
Electronic Chrome & Grinding, Inc.	CAD 008391427
(21) HAZARDOUS WASTE STREAM DESCRIPTION	(22) CALIFORNIA WASTE CODE
Waste Grinding Sludge	CWC 352

(23) THIS HAZARDOUS WASTE IS (please check one):

___ Processed onsite in a wastewater treatment unit for discharge to POTW or NPDES permit (Category A)

_X_ Other SB 14 hazardous waste (Category B)

___ Extremely hazardous waste

ACCOMPLISHMENTS

Your 2002 SB 14 Plan, Performance Report, or Compliance Checklist, has this information.

(24) Provide the following information for this waste stream:

How much waste was generated in the 2002 Reporting Year? 1500 pounds

Describe the source reduction measure(s) implemented since 2002 (add page if needed): Better awareness of hazardous wastes being generated.

Estimate when this source reduction measure was implemented: _____ Month 2002 year

For this measure, what source reduction quantity was projected in the 2002 Plan: _____ pounds per year

Estimate the quantity of waste reduced annually by this measure since implementation: Production increased 140%; waste decreased 27% pounds per year

(See Summary Progress Report publication or SB 14 Guidance Manual Chapter 6, to help estimate hazardous waste reduced.)

PROJECTIONS

Your 2006 SB 14 Plan or Compliance Checklist has this information.

(25) Provide the following information for this waste stream:

How much waste was generated in the 2006 Reporting Year? 1100 pounds

Describe the source reduction measure selected to be implemented By 2010: (Add page if needed.) _____

Estimate when this source reduction measure will be implemented: _____ month _____ year

What is the annual projected source reduction quantity identified in the 2006 Plan? 5% 55 pounds per year

State of California – California Environmental Protection Agency | Department of Toxic Substances Control

TABLE 2: SPECIFIC WASTE STREAM INFORMATION

DATE 07/12/07

Complete and submit a separate Table 2 for each major hazardous waste stream and for each minor hazardous waste stream for which a source reduction measure was selected.

IDENTIFICATION

(19) NAME OF GENERATOR, FACILITY, or BUSINESS	(20) EPA ID NO.
Electronic Chrome & Grinding, Inc.	CAD 008391427
(21) HAZARDOUS WASTE STREAM DESCRIPTION	(22) CALIFORNIA WASTE CODE
Waste cooling water with water soluble oil	CWC 223

(23) THIS HAZARDOUS WASTE IS (please check one):

___ Processed onsite in a wastewater treatment unit for discharge to POTW or NPDES permit (Category A)

_X_ Other SB 14 hazardous waste (Category B)

___ Extremely hazardous waste

ACCOMPLISHMENTS

Your 2002 SB 14 Plan, Performance Report, or Compliance Checklist, has this information.

(24) Provide the following information for this waste stream:

How much waste was generated in the 2002 Reporting Year? 4000 pounds

Describe the source reduction measure(s) implemented since 2002 (add page if needed): Better awareness of hazardous wastes being generated.

Estimate when this source reduction measure was implemented: _____ Month 2002 year

For this measure, what source reduction quantity was projected in the 2002 Plan: _____ pounds per year

Estimate the quantity of waste reduced annually by this measure since implementation: Production increased 140%; waste increased 50% pounds per year

(See Summary Progress Report publication or SB 14 Guidance Manual Chapter 6, to help estimate hazardous waste reduced.)

PROJECTIONS

Your 2006 SB 14 Plan or Compliance Checklist has this information.

(25) Provide the following information for this waste stream:

How much waste was generated in the 2006 Reporting Year? 6000 pounds

Describe the source reduction measure selected to be implemented By 2010: (Add page if needed.) _____

Estimate when this source reduction measure will be implemented: _____ month 2007 year

What is the annual projected source reduction quantity identified in the 2006 Plan? 5% 300 pounds per year

State of California – California Environmental Protection Agency

Department of Toxic Substances Control

TABLE 2: SPECIFIC WASTE STREAM INFORMATION

DATE 07/12/07

Complete and submit a separate Table 2 for each major hazardous waste stream and for each minor hazardous waste stream for which a source reduction measure was selected.

IDENTIFICATION

(19) NAME OF GENERATOR, FACILITY, or BUSINESS	(20) EPA ID NO.
Electronic Chrome & Grinding, Inc.	CAD 008391427
(21) HAZARDOUS WASTE STREAM DESCRIPTION	(22) CALIFORNIA WASTE CODE
Contaminated chromic acid plating bath	CWC 792

(23) THIS HAZARDOUS WASTE IS (please check one):

____ Processed onsite in a wastewater treatment unit for discharge to POTW or NPDES permit (Category A)

__X__ Other SB 14 hazardous waste (Category B)

____ Extremely hazardous waste

ACCOMPLISHMENTS

Your 2002 SB 14 Plan, Performance Report, or Compliance Checklist, has this Information.

(24) Provide the following information for this waste stream:

How much waste was generated in the 2002 Reporting Year? 0 pounds

Describe the source reduction measure(s) implemented since 2002 (add page if needed): Non-routinely generated

Estimate when this source reduction measure was implemented: _____ Month _____ year

For this measure, what source reduction quantity was projected in the 2002 Plan: _____ pounds per year

Estimate the quantity of waste reduced annually by this measure since implementation: _____ pounds per year

(See Summary Progress Report publication or SB 14 Guidance Manual Chapter 6, to help estimate hazardous waste reduced.)

PROJECTIONS

Your 2006 SB 14 Plan or Compliance Checklist has this Information.

(25) Provide the following information for this waste stream:

How much waste was generated in the 2006 Reporting Year? 14,000 pounds

Describe the source reduction measure selected to be implemented By 2010: (Add page if needed.) Reduce need to discharge a plating bath

Estimate when this source reduction measure will be implemented: 7 month 2007 year

What is the annual projected source reduction quantity identified in the 2006 Plan? NA pounds per year

Section1: Generator Information

Company Name: Electronic Chrome & Grinding Co, Inc.

Generator's USEPA ID Number: CAD 008391427

SIC Code: 3471

NAICS Code [2] _____

Location Address:
Street: 9128-32 Dice Road

City: Santa Fe Springs State: CA Zip: 90670

Mailing Address:

Street: 9128-32 Dice Road

City: Santa Fe Springs State: CA Zip: 90670

Contact Person: Mike Reed

Telephone: (562) 946-6671

Fax number: (562) 946-5903

Email: bluecrowns@aol.com

Quantity of hazardous waste generated in the reporting year[3] (total): 25.6 tons

Section 1 Generator Information

[1] For the definition of a "small business," please see Section 8, page 43

[2] Your North American Industry Classification System (NAICS) Code can be determined by going to http://www.naics.com

[3] Reporting year is the calendar year immediately preceding the year in which your Compliance Checklist is to be prepared.

Section 1 Generator Information

Waste Description and corresponding California Waste Code (CWC). Use additional copies of this page if you need more space to describe waste streams.

CWC: 181 D007 - F006

Waste description: Sludge filter cake from treating spent muriatic stripping solution containing chrome

Weight Generated in 2006: 30,000 P

CWC: 352

Waste description: Waste grinding sludge

Weight Generated in 2006: 1,100 P

CWC: 223

Waste description: Water soluble oil in cooling water for grinders

Weight Generated in 2006: 5,800 P D002 D004 D007 D0011

CWC: 792

Waste description: Waste chromic acid solution (This is a non-routine waste)

Weight Generated in 2006: 14,300 P

Section 2: Compliance Checklist

Complete the following checklist to determine if you are taking advantage of opportunities to reduce your hazardous waste before it is generated. The preferred response to each question is highlighted in bold print and helpful suggestions or benefits are discussed in the right hand column.

2.1 Administrative Steps - Business Practices

1.	**Do you have a formal policy or mission statement stating your commitment to source reduction?** ☐ Yes ☒ No *verbal only*	✓	A formal statement supporting source reduction is an important part of encouraging employee source reduction awareness.
2.	**Do you offer an incentive program to employees to promote good housekeeping practices?** ☒ **Yes** ☐ No	✓	Incentive programs encourage employees to follow good housekeeping practices. Incentive programs do not have to be monetary programs, but can involve other incentives such as recognition or awards.
3.	**Does your accounting procedure allocate the costs associated with the management of hazardous wastes to the processes generating the hazardous wastes?** ☒ **Yes** ☐ No	✓	Separate accounting of hazardous waste management costs by process or production area can be a valuable tool to prioritize source reduction efforts by directing initial attention to the most costly wastes. Sometimes just by individualizing the cost of waste management workers will find ways to reduce waste generation.

2.2 Administrative Steps – Employee Education

1.	**Do you offer employee training on how to avoid excessive waste generation through the proper handling and storage of materials?** ☒ Yes ☐ No	✓	Management should make a commitment to develop awareness of source reduction among employees and offer education and training opportunities. You can reduce the amount of hazardous waste generated due to spills if you train your employees to properly handle and store hazardous materials. Some trade associations and local environmental health agencies sponsor employee training seminars and some consulting firms offer training in handling hazardous materials as part of their package of services.
2.	**Are employees educated in source reduction techniques and encouraged to apply them?** ☒ Yes ☐ No verbal reminders by management	✓	Introducing employees to source reduction concepts will allow them to develop innovative ideas that enable you to reduce disposal costs, minimize liability, and protect worker health and safety.
3.	**Do you publicize your source reduction achievements in the form of a newsletter to your employees and your community?** ☐ Yes ☒ No	✓	Sharing source reduction successes encourages source reduction awareness among employees. Successful source reduction activities can make a good local news story and can help earn and retain customers and clients.
4.	**Are periodic sessions held to keep employees up-to-date on source reduction measures in the use of hazardous materials?** ☒ Yes ☐ No	✓	Source reduction training is not a one time exercise. A full time, ongoing commitment must be made by both owners and operators of a business.

5.	**Are job functions defined for each employee?** ☒ **Yes** ☐ No	✓	Identifying specific duties for personnel can help you prevent mishandling hazardous waste. Communicate to the employees what their job entails and make sure they understand what is expected of them. Make source reduction a part of everyone's job. Provide written guidance, such as a job manual. Encourage workers to offer source reduction suggestions.
6.	**Are regular meetings held to keep personnel current on hazardous materials management policy and procedures?** ☒ **Yes** ☐ No 3-4/yr.	✓	As new developments occur in hazardous materials management, employees should be kept informed in order to perform their duties more efficiently.

2.3 Administrative Steps - Inventory Control

1.	**Are raw material containers inspected before being accepted?** ☒ **Yes** ☐ No	✓	Inspecting containers before accepting them can prevent the receipt of leaking or damaged containers which can lead to an expensive clean up and disposal costs.
2.	**Are all raw materials tested or checked before being accepted from the suppliers?** ☐ **Yes** ☒ No	✓	Off-specification raw materials, if accepted, can become hazardous waste. In addition, the use of these materials may generate an off-specification product which may then require disposal as a hazardous waste. Some off-specification products can be reworked into usable products.

3.	**Are raw material containers dated as received?** ☒ Yes ☐ No	✓	A received date is important for keeping track of the shelf life of a raw material and preventing materials from becoming obsolete and a hazardous waste. It also comes in handy when rotating stock.
4.	**Do you use a "first in, first out" materials usage policy?** ☒ Yes ☐ No	✓	Using materials in a "first in, first out" order can prevent stock from becoming obsolete and a hazardous waste. You can easily rotate and maintain your stock by labeling, dating, and inspecting new material containers as they are received. Then, use the earliest labeled stock.
5.	**Do you purchase raw materials and perishable hazardous material stocks on an "only as needed" basis?** ☒ Yes ☐ No Extra stock kept to a minimum	✓	Having a minimum supply of raw materials can prevent accumulation and eliminate large amounts of excess materials which may not be used at a later date. Also, overstock of perishable materials can contribute to hazardous waste.
6.	**Are material balances performed for the critical processes of your site?** ☒ Yes ☐ No	✓	Performing a material balance for critical processes will allow you to ensure the efficiency of production as well as optimize your source reduction efforts by knowing the raw materials entering and the products and wastes leaving your processes.
7.	**Are material inventories computerized? Do you track the usage of raw materials?** ☐ Yes ☒ No but plan to dose within the next year	✓	Computerizing your inventory will allow you to easily track the materials you use and how much is remaining. This will allow you to keep the inventory at a point where you use up your stock just as new materials are arriving.

2.4 Administrative Steps - Materials Storage and Handling

1.	**Are hazardous materials stored in covered containers?** ☒ **Yes** ☐ No	✓	Covering individual containers can prevent evaporation, contamination by foreign particles, and the frequency of spills.
2.	**Is your hazardous materials storage area covered?** ☒ **Yes** ☐ No	✓	Hazardous materials are best protected in covered areas. Uncovered storage areas allow rainwater to contaminate raw materials and can increase the volume of hazardous waste. Sunlight can degrade or change the character of raw materials. Absorbed heat can raise pressure inside containers, creating a potentially dangerous situation.
3.	**Are hazardous materials stored separately from non-hazardous materials?** ☒ **Yes** ☐ No	✓	Hazardous materials should be stored separately from non-hazardous materials to prevent the creation of larger amounts hazardous waste if a spill occurs.
4.	**Are materials stored in reusable containers?** ☐ **Yes** ☒ No	✓	Storing materials in reusable containers will allow you to return the empty container to the supplier and reduce the amount of waste you must dispose. Check with your supplier to see if return options are available.
5.	**Are raw materials stored in high traffic areas?** ☐ **Yes** ☒ No **If yes, can traffic through the storage area be reduced?** ☐ **Yes** ☐ No	✓	Heavy traffic may contaminate raw materials with dirt or dust and may cause spilled materials to become dispersed throughout your site.

6.	**Do you store hazardous materials within a diked concrete pad?** ☒ Yes ☐ No Process tanks also are contained in diked areas	✓	A diked concrete pad will contain spills better than asphalt or dirt. There are also molded plastic pallets available that provide secondary containment.
7.	**Do you store hazardous wastes and hazardous materials in a secure storage area?** ☒ Yes ☐ No	✓	A secure storage area will prevent unauthorized persons from entering the storage area and harming themselves or spilling materials and waste.
8.	**Are the proper tools and procedures available to move drums safely?** ☒ Yes ☐ No	✓	Powered equipment or hand trucks should be used to move drums so as to prevent damage or punctures. Under no circumstances should drums be tipped or rolled, even when empty. Negligent transport procedures will cause drum damage, particularly to seams, which can lead to leaks or ruptures during future use. Drums should also be capped tightly before they are moved.

2.5 Administrative Steps - Spill/Leak Control

1.	**Do you generate hazardous wastes due to spills during raw material storage or during equipment cleaning?** ☐ Yes ☒ No spills are are a rare occurence	✓	Spills occur mainly because of splashing during manual transfer, tank overfilling, and leaks in process equipment and piping. Scoop spills up to the fullest extent possible, and try to rework them into product.
		✓	Remember to keep equipment in good repair and provide adequate oversight to prevent spilling during manual transfer.

2.	**Do you have safeguards to prevent the spillage of liquids while filling storage tanks?** ☐ **High level shutdown alarms** ☐ **Flow totalizers** ☒ **Pipeline drainage or purging** ☒ **Dikes**	✓	All of these safeguards can help you prevent and reduce the amount of hazardous waste you generate due to spills.
3.	**Do you have a prepared plan to respond to hazardous materials spills?** ☒ **Yes** ☐ No	✓	A prompt response helps to minimize health risks to workers, reduce adverse environmental effects, and reduce potential liability. Furthermore, the law requires a prepared plan to respond to hazardous spills.
5.	**Do you routinely inspect all waste storage tanks, drums, and containers for leaks and proper storage?** ☒ **Yes** ☐ No	✓	Routine inspections can reduce hazardous spills by identifying potential problems such as leaking or improperly stored containers.
5.	**Do you routinely inspect and maintain your equipment and processes to prevent leaks and spills?** ☒ **Yes** ☐ No	✓	Routine inspections of pumps, valves, pipes and processes for leaks can result in prompt replacement of gaskets, packing or the addition of catch basins to reduce waste.
6.	**If a hazardous waste spill or improper storage of a waste is discovered during an inspection, is it dealt with immediately?** ☒ **Yes** ☐ No	✓	An immediate response to a hazardous waste spill or improper storage of hazardous waste can minimize employee exposure, damage to the environment, liability, and waste disposal costs. Even a small dripping leak can produce several gallons of waste per day.

7.	**Do you conduct practice drills for major spills?** ☒ Yes ☐ No Twice per year	✓	Periodic drills can improve the readiness and effectiveness of employees in dealing with emergency situations. You can reduce wastes generated from spills and their cleanup with a quick response to a spill.

2.6 Input Changes

1.	**Have you researched the use of Non-hazardous or less hazardous material alternatives?** ☒ Yes ☐ No	✓	Substitution of non-hazardous or less hazardous materials for hazardous materials reduces or eliminates a hazardous waste stream.
	Eliminated 1,1,1-TCA Eliminated MEK	✓	Examples of alternatives include the use of soy oil-based printing inks as a substitute for petroleum-based printing inks, using aqueous cleaner for a chlorinated solvent, and using trivalent chromium electroplating in place of hexavalent chromium plating.
		✓	Non-hazardous and less hazardous alternatives should be fully investigated before making a final decision.
2.	**Have you considered substituting aqueous cleaners for petroleum based or chlorinated solvents?** ☒ Yes ☐ No ☐ Does not apply Use Ecolab Pro-Force to clean parts that are not going into the chrome plating tanks	✓	Aqueous cleaners are nonflammable and do not generally give off toxic fumes. In addition, most aqueous cleaners are less hazardous to workers, public and the environment. quality. Some raw materials may be purchased without requiring cleaning, thus eliminating the initial cleaning step.

3.	**If you are using caustic cleaners, have you tried alternative commercial cleaning solutions?** ☒ **Yes** ☐ No ☐ Does not apply	✓	Businesses may be able to substitute caustic cleaning solutions with aqueous alkaline cleaning solutions that halve the replacement frequency, resulting in less waste requiring disposal.
4.	**Are biodegradable, film-free detergents a possible substitution for cleaning solvents?** ☒ **Yes** ☐ No ☐ Does not apply Use Ecolab Pro-Force to clean parts that are not going into the chrom plating Tanks	✓	Use of biodegradable cleaners could eliminate hazardous wastes such as solvent contaminated rags, waste cleaning solvent, and empty solvent containers. Biodegradable cleaners have two significant environmental benefits over solvents: they will not contribute to photochemical smog as do volatile organic compounds (VOCs), and they do not present a respiratory health hazard to workers.
5.	**Have you considered using low VOC paints and coatings?** ☐ **Yes** ☐ No ☒ Does not apply	✓	Using low VOC paints and coatings can reduce hazardous waste and air pollution, as well as significantly reduce the need for and the use of potentially hazardous materials, such as solvents derived from petroleum distillates. Exercise caution when selecting or using low VOC paints since they may still contain toxic metal pigments.

2.7 Operational Improvements

1.	**Do you segregate your waste streams?** ☒ **Yes** ☐ No	✓	Segregating wastes will aid in recycling materials and eliminate the mixing of non-hazardous wastes with hazardous wastes. Mixed wastes are more difficult and costly to treat and dispose.
	Do you segregate all empty bags, packages, and containers that contained hazardous materials from those that contained non-hazardous materials? ☒ **Yes** ☐ No		
2.	**Are your hazardous waste and non-hazardous waste containers properly labeled?** ☒ **Yes** ☐ No MSDS's are kept current and on site	✓	Proper labeling is a requirement of federal law. Properly labeled containers may decrease the likelihood of mixing incompatible wastes which might cause an explosion, or mixing hazardous wastes with nonhazardous wastes which could increase your volume of hazardous waste.
3.	**Are liquid materials transferred using pumps and piping?** ☒ **Yes** ☐ No ☐ Does not apply	✓	Transporting liquids using pumps and piping can help you reduce the amount of chemicals spilled during transfer.
4.	**Are the materials stored close to the process areas where they are used?** ☒ **Yes** ☐ No	✓	Storing materials near the processing areas where they are used will reduce the distance you need to transport them and therefore reduce your handling and spillage.
5.	**Do you maintain and enforce a clear policy of using raw materials only for their intended uses?** ☒ **Yes** ☐ No	✓	You may generate unnecessary hazardous waste if you use supplies for purposes other than their intended uses. For example, don't use equipment cleaning solvents to clean your floors.

6.	**Do you plan your production schedule to reduce the generation of hazardous waste?** ☒ Yes ☐ No Small orders are combined & plated together to reduce lost time, wasted materials, & waste sludges	✓	Plan your production schedule in a way that reduces the need for intermediate storage and excessive cleaning. For example when blending paints, do you schedule the tint mixing from light to dark to avoid excessive cleaning, or mix only those paints having a common base at one time?
7.	**Have you attempted to purchase pre-weighed materials in soluble bags?** ☐ Yes ☒ No	✓	Additives may be available in pre-weighed soluble bags, which do not require container disposal.
8.	**Do you plan your mixing operations so that you will only use the necessary raw materials?** ☒ Yes ☐ No	✓	Planning is the key to efficiency. Plan your mixing so that you use only the necessary components. A properly sized container will also reduce waste.
9.	**Do you test your products in your quality control laboratory before attempting full scale production?** ☐ Yes ☒ No Doesn't apply	✓	Accurate lab scale tests can eliminate the production of off specification products, which can become hazardous waste.
10.	**The solvent waste generated from equipment cleaning is** ☐ **drummed for disposal** ☐ **drummed for disposal after being used _____ times** ☐ **drummed for use in a sub-subsequent process** ☐ **recycled off-site** ☐ **recycled/reused on-site** ☐ **sent to a holding tank** ☒ **does not apply**	✓	Maximize your benefits from the solvents you do use. Reusing solvents as much as is practicable can significantly reduce your total solvent waste generation. For example can you reuse a solvent from a process cleaning operation as a product thinner or ingredient?

11.	**Is the piping to and from raw material or product tanks pigged before flushing?** ☐ **Yes** ☐ No ☒ Does not apply	✓	Use a plastic or foam pig to clean pipes. The pig (slug) is forced through the pipe from the tank The pig pushes ahead any product left clinging to the walls of the pipe. This increases yield and reduces the degree of pipe cleaning required.
		✓	The equipment (launcher and catcher) must be carefully designed so as to prevent spills, sprays, and potential injuries, and the piping runs are free of obstructions so that the pig does not become stuck or lost in the system.
12.	**What is the cleaning method used for cleaning raw material and product storage tanks?** ☐ **manually scraped**	✓	To reduce the amount of product left clinging to the walls of a raw material or product storage tank, use rubber wipers to scrape the tank sides.
	☐ **washed with high pressure spray system using caustic then solvent rinsed** ☐ **Other** _____ _____ _____ ☒ **does not apply**	✓	Mechanization or automation of this step should be considered to increase raw material yield and reduce the quantity of waste produced from tank cleaning.
13.	**Have you established procedures for cleaning process equipment? Are they cleaned immediately after completing the task? Is there a scheduled maintenance and cleaning program?** ☐ **Yes** ☐ No ☒ Does not apply	✓ ✓	Equipment should be cleaned immediately in order to reduce the amount of solvent that will be necessary to clean it. In some instances, having a scheduled maintenance and cleaning program for process equipment and parts can have a profound impact on reducing hazardous wastes.

14.	**Is there an established procedure for communication between cleaning and production crews?** ☒ Yes ☐ No	✓	Proper coordination between production and cleaning crews can prevent such things as product drying in tanks.
15.	**Have you considered a high pressure spray system for cleaning parts or equipment?** ☒ Yes ☐ No ☐ Does not apply Use glass beads for blasting parts	✓	High pressure spray systems can be used to clean equipment and tanks and reduce water use by 80 to 90 percent. In addition, high pressure sprays can remove partially dried product so that the need for caustic cleaners is reduced.
16.	**Do you capture unused raw material or product prior to cleaning process equipment?** ☐ Yes ☒ No Any unused raw material is sent with filter cake for recycling	✓	The method for saving unused raw material or product will be process specific. In general, capturing as much material as possible before cleaning is important because it saves on the use of cleaning solvent.
17.	**Do you follow the manufacturer's suggested methods for cleaning and using your process equipment?** ☒ Yes ☐ No	✓	It is important to follow the manufacturer's suggested procedures. They are intended to maximize efficiency and minimize waste.
18.	**Can you install counter current rinsing processes?** ☐ Yes ☒ No ☒ Does not apply	✓	Counter current rinsing can reduce waste generation especially if the most concentrated bath becomes makeup for the process solution.

2.8 Production Process Changes

1.	**Do you use automated feeding systems to feed raw materials into your processes?** ☒ Yes ☐ No For chemicals used in the HW treatment center; water is used for make-up in the chrome plating tanks	✓	Automated feeding systems can help reduce spillage. Switching from numerous small containers to one larger container can help reduce cleaning waste. For large scale dedicated equipment, clean-in-place systems are effective in reducing cleaning waste.
2.	**If you are planning any future plant modernizations, do you consider replacing existing equipment with more efficient ones which generate less hazardous waste?** ☒ Yes ☐ No In 1999 a HEPA system replace many scrubbers	✓	More efficient equipment can reduce your total hazardous waste volumes while meeting or exceeding current production rates.
3.	**Have you investigated the effect of reduced cleaning on product quality?** ☒ Yes ☐ No In 2006, implemented a new cleaning procedure Polishing shop closed off Use a material, "Clean Sweep" on the floor to absorb dust	✓	Unnecessary cleaning of equipment increases the amount of cleaning wastes generated. The feasibility of eliminating cleaning steps between subsequent production steps should be explored. Conduct experiments on a small scale in the laboratory to measure the degree of contamination due to the elimination of cleaning. If contamination of the products is within quality control standards, then the clean up step can be eliminated.
4.	**Have you replaced your single-stage rinse system with a multi-stage countercurrent rinse system?** ☐ Yes ☒ No All rinse water is treated, filtered & reused. Filter cake is recycled off-site	✓	This can reduce the amount of wastewater generated. Multiple rinse tanks can be used to provide sufficient rinsing while significantly reducing the volume of rinse water used. The use of a multi-stage countercurrent rinsing system can use up to 90% less rinse water than a conventional single-stage rinse system.

5.	**Do you employ drag-out rinsing techniques?** ☒ Yes ☐ No	✓	Drag-out loss of process chemicals is a significant source of waste generation. Drag-out rinsing techniques can reduce drag-out substantially.
6.	**Do you operate process baths at the lower end of the manufacturer's suggested range of operating concentration?** ☐ Yes ☒ No Mid range	✓	Controlling the chemical concentration of the process bath can reduce the drag-out loses.
7.	**Are the plating solution tanks at your facility equipped with a drip collection device?** ☐ Yes ☒ No Parts are rinsed over the tank after plating 2 - 24 hours	✓	Drag-out of plating solutions can be minimized by installing lip (drip) collection devices after each tank.

2.9 Product Reformulation

1.	**Can you modify the specifications, design or composition of your product so that less hazardous waste is generated?** ☐ Yes ☒ No ☐ Does not apply	✓	If your product results in a hazardous waste at the end of its service life, it may be costly to manage as a hazardous waste and may be a long term liability to you and your customers.

Section 3: Evaluation of Source Reduction Measures

After completing the checklist and identifying potential source reduction opportunities, you must evaluate your options to select those you wish to implement.

Source reduction is defined in the law as any action which causes a net reduction of the generation of hazardous waste, or any action taken before the hazardous waste is generated that results in the lessening of the properties which cause it to be classified as a hazardous waste. There are five source reduction approaches under which specific source reduction measures may be grouped:

1) Input change
2) Operational improvement
3) Production process change
4) Product reformulation
5) Administrative steps

However, source reduction measures are none of the following:

- Any action taken after a hazardous waste is generated
- Any action that concentrates the constituents of a hazardous waste to reduce its volume or that dilutes the hazardous waste to reduce its hazardous characteristics
- Any action that shifts hazardous wastes from one environmental medium to another environmental medium
- Treatment

There are a variety of different factors to consider when evaluating potential source reduction measures. These factors include:

- Expected change in the amount of hazardous waste generated
- Technical feasibility
- Economic feasibility
- Effect on product quality
- Employee health and safety considerations
- Requirements for permits, variances, and compliance schedules of applicable agencies
- Releases and discharges to all media.

You are not limited to the factors listed above. You may develop additional factors that you feel are important in developing a successful source reduction program at your site. Examples of additional factors you may consider include:

- Reduction in the hazardous characteristic of the waste
- Previous success of the measure within your organization
- Previous success of the measure in other industries
- Length of implementation period
- Ease of implementation.

ECTG has zero waste discharge to LAC POTW
ECTG has BACT (HEPA system) to control air emissions
ECTG has bermed all HM storage areas, H waste treatment T storage areas, T all HM process tanks.
ECTG has eliminated all use of 1,1,1-TCA, MEK, T $NaHSO_4$
ECTG has implemented new dust control T good housekeeping procedures in both the polishing shop T the plating shop
ECTG provides employee training to stay current with environmental regulations; Examples include:

SCAQMD classes
Safety & Security Professionals classes
MFASC classes

ECTG holds 2 spill response meetings/year
ECTG holds 3 hazardous waste policy meetings/year

Section 4: Implementation Timetable

Source reduction measures you have chosen to implement at your site	The dates when you plan to begin implementing each measure and the date when the measure will be operational
ECTG plans to computerize material inventories	1/08; operational 7/08
ECTG plans to increase staff awareness of HW + HM reduction measures through training classes offered by SMFASC	1/08; operational 7/08

Section 5: Numerical Goal

Every generator who is subject to SB 14 must prepare a four-year numerical source reduction goal. The goal is included in a generator's compliance checklist (or Plan, if applicable).

The goal is not simply a reflection of your intended source reduction under SB 14, rather it is your estimate of the source reduction that your site could optimally strive to achieve over the next four years. The goal, a single numerical percentage, would reflect your organization's source reduction vision and commitment. The goal must reflect your company's waste stream reductions due only to source reduction and would exclude effects due to production variation or economic influences.

For example, Source Reduction Goal (%) =

$$\frac{\text{Total hazardous waste generation reduced by optimizing source reduction practices}}{\text{Total hazardous waste generation if source reduction measures were not considered at your site}} \times 100$$

The four-year numerical source reduction goal for this site is:
__5__ % for the years __2006__ to __2010__ (your four-year planning period).

Section 6: Certification

There are two certifications required by regulations: a technical certification and a financial certification. (Section 67100.13, Title 22, California Code of Regulations).

6.1 Technical Certification

The compliance checklist must be reviewed and certified by any one of the following persons for technical completeness. Check the appropriate box and provide the information below:

- ☐ an engineer who is registered as a professional engineer pursuant to section 6762 of the Business and Professions Code
- ☐ an environmental assessor who is registered pursuant to section 25570 of the Health and Safety Code
- ☒ an individual who is responsible for the processes and operations of the site

The person performing the technical certification of the compliance checklist must certify all of the following:

- The compliance checklist identifies and addresses all of the major waste streams at the site.
- The five approaches to source reduction have been considered.
- The Plan fully explains the decision process used to determine which measures to implement, including the rationale for rejecting the measures that will not be implemented. The Plan includes an implementation schedule.
- The Plan does not merely shift hazardous waste from one environmental medium (air, water or land) to another by increasing emissions or discharges to air, water or land.

"I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or the persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for making false statements or representations to the Department, including the possibility of fines for criminal violations."

Please print the name of the person certifying this compliance checklist:

Name: Mike Reed

Title: VP/G.M

Signature: Mike Reed Date: 7 / 16 / 07

TECHNICAL CERTIFICATION STATEMENT FOR THE COMPLIANCE CHECKLIST

(Example Format)

I certify this compliance checklist meets all of the following requirements:

(1) The compliance checklist addresses each hazardous waste stream identified pursuant to section 67100.5(h), Title 22 of the California Code of Regulations.
(2) The compliance checklist addresses the source reduction approaches specified in section 67100.5(j), Title 22 of the California Code of Regulations.
(3) The compliance checklist clearly sets forth the measures to be taken with respect to each hazardous waste stream for which source reduction has been found to be technically feasible and economically practicable, with timetables for making reasonable and measurable progress and documents the rationale for rejecting available source reduction measures.
(4) The compliance checklist does not merely shift hazardous waste from one environmental medium to another environmental medium by increasing emissions or discharges to air, water or land.

Name: Michael Reed

Title: VP/G.M

Signature: Michael Reed Date: 7 / 30 / 07

6.2 Financial Certification

The compliance checklist must be reviewed and certified that the reviewer is made aware of the checklist contents and resource commitment. Financial certification shall be made by any one of the following persons able to commit company finances. Check the appropriate box and provide the information below:

- ☒ the owner
- ☐ the operator
- ☐ the responsible corporate officer of the site
- ☐ an authorized individual capable of committing financial resources necessary to implement selected source reduction measures.